

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Amendment of Rules Governing Ultra-Wideband) RM-11844
Devices and Systems)

ORDER DENYING EXTENSION OF TIME TO FILE COMMENTS AND REPLY COMMENTS

Adopted: August 14, 2019

Released: August 14, 2019

By the Chief, Office of Engineering and Technology:

1. On July 18, 2019, the Consumer & Governmental Affairs Bureau released a Public Notice¹ seeking comment on a Petition filed by Robert Bosch LLC (Bosch Petition) requesting that the Commission initiate a review of the Part 15, Subpart F regulations governing Ultra-Wideband (UWB) devices and systems.² Consistent with the provisions of Section 1.405 of the Commission's rules,³ the Public Notice established August 19, 2019 as the deadline for filing comments regarding the Bosch Petition, and September 3, 2019 as the deadline for filing reply comments.

2. On August 2, 2019, the GPS Innovation Alliance (GPSIA) filed a motion to extend the comment and reply comment deadlines by 30 days each -- to September 18, 2019 and October 3, 2019, respectively.⁴ GPSIA claims that the Bosch Petition presents numerous complex technical questions that will take some time to consider and which cannot be constructively addressed under the current timeframe, and that additional time would allow it and interested parties to provide constructive input that would help shape the contours of any subsequent rule making proceeding that the Commission might initiate.⁵

¹ *Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemakings Filed*, Public Notice, Report No. 3130, July 18, 2019, RM No. 1184.

² Petition for Rule Making In the Matter of Amendment of Rules Governing Ultra-Wideband Devices and Systems (filed June 18, 2019) (Bosch Petition), which was assigned RM-11844, <https://ecfsapi.fcc.gov/file/10618992215487/2019%20FINAL%20PETITION%20FOR%20RULE%20MAKING%20for%20FCC%20Filing.pdf>.

³ 47 CFR § 1.405.

⁴ Motion for Extension of Time to File Comments, RM-11844 (Motion, filed August 2, 2019), <https://ecfsapi.fcc.gov/file/108022839624626/GPSIA%20-%20Motion%20for%20Extension%20of%20Time.pdf>. On August 1, 2019, GPSIA submitted an earlier Motion for Extension of Time in this proceeding; however, it submitted a corrected Motion the next day, which was accompanied by an Erratum, <https://ecfsapi.fcc.gov/file/108022839624626/GPSIA%20-%20Erratum.pdf>. This Order is in response to the corrected Motion, filed August 2, 2019.

⁵ Motion at 2-3. *See also* ASRI Statement in Support of Motion for Extension of Time to File Comments, RM-11844 (filed August 5, 2019).

3. As set forth in section 1.46 of the Commission's rules, it is the policy of the Commission that extensions of time shall not be routinely granted.⁶ Here, we are considering a threshold question of how to act on a petition for rule making, as opposed to making substantive changes to our rules or procedures.⁷ We further note that Commission proceedings involving technical rules, such as those pertaining to UWB use, can be expected to contain complex filings of a detailed nature, and the Bosch Petition is consistent with that expectation.⁸ Given the nature of the petition and the fact that its complexity and length is not exceptional for the subject it addresses, we find nothing sufficiently unique or unusual that would warrant deviation from our well-established rules pertaining to the treatment of petitions for rule making.

4. Accordingly, IT IS ORDERED that, pursuant to sections 4(i), 4(j), 5(c), and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j), 155(c), and 303(r), and section 1.46 of the Commission's rules, 47 CFR § 1.46, the Motion for Extension of Time filed by the GPS Innovation Alliance on August 2, 2019, IS DENIED.

5. This action is taken under delegated authority pursuant to sections 0.31 and 0.241 of the Commission's rules, 47 CFR §§ 0.31 and 0.241.

FEDERAL COMMUNICATIONS COMMISSION

Julius Knapp
Chief
Office of Engineering and Technology

⁶ 47 CFR § 1.46(a).

⁷ It is premature of GPSIA to anticipate that the Commission will determine that it should proceed to initiate a Notice of Proposed Rulemaking. Even under such a scenario, parties would have ample opportunity under our notice-and-comment procedures to fully participate prior to the adoption of final rules.

⁸ The Bosch petition consists of 51 pages, including a seven-page Appendix.